

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CMG HOLDINGS GROUP, INC., as successor to	:	
XA THE EXPERIENTIAL AGENCY, INC.,	:	Civil Action No.: 15-cv-05814-JPO
	:	
Plaintiff,	:	
	:	
vs.	:	DECLARATION OF
	:	<u>JEAN WILSON</u>
JOSEPH WAGNER, HUDSON GRAY LLC,	:	
DARREN ANDERECK, JESSIE LOMMA,	:	
MICHAEL DAY, JEAN WILSON, ESTELLE	:	
PIZZO, STUDIO AG, LLC, REMIGIO GUDIN,	:	
and MIXED COMPANY, INC.,	:	
	:	
Defendants.	:	
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JOSEPH WAGNER, JEFFREY SMITH, DARREN	:	
ANDERECK, and JESSIE LOMMA,	:	
	:	
Third-Party Plaintiffs,	:	
	:	
vs.	:	
	:	
GLENN LAKEN and ALEXIS LAKEN,	:	
	:	
Third-Party Defendants.	:	
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JEAN WILSON, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I am a defendant herein and an employee of defendant HudsonGray, Inc. I am fully familiar with the facts set forth below.
2. I submit this Declaration in opposition to Plaintiff's and Third-Party Defendants' motion for partial summary judgment.
3. I deny the vague and ambiguous allegations made in paragraph 4 of the Declaration of Alexis Laken, dated November 15, 2018 (the "Alexis Laken Declaration").

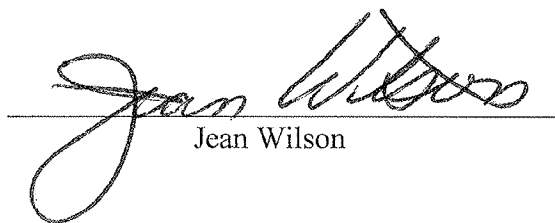
Specifically, I deny that I “carefully orchestrated and planned” any wrongdoing with Joseph Wagner or any other of the defendants named in this action. Furthermore, I did not commit any fraudulent acts, and so I deny that Alexis Laken learned of any such acts.

4. I also deny the allegations made in paragraph 11 of the Alexis Laken Declaration. Specifically, I deny that I caused XA to perform valuable services for Mike Axelrod – or for anyone else – without seeking the agreed upon payment. In fact, in Alexis Laken’s email to Mr. Axelrod’s attorney (Doc. No. 145-3, Ex. D), she noted that I had previously contacted Mr. Axelrod in an effort to collect the alleged debt.

5. Contrary to the allegations in paragraph 6 of the Alexis Laken Declaration, I did not feed the Defendants confidential or proprietary XA data.

6. Further, contrary to the allegations in paragraph 8 of the Alexis Laken Declaration, I did not create the email stating that the “administrator” was on a long vacation. Rather, I received that email in response to my inquiry to the “administrator.”

Executed on December 19, 2018.



Jean Wilson